

EXHIBIT S

Keith Flynn

From: Keith Flynn
Sent: Friday, March 27, 2015 4:02 PM
To: 'Miglio, Terrence J.'
Subject: RE: Reeser
Attachments: STIPULATED ORDER RE HOOD (3d).docx

Pursuant to our conversation, I have attached a new version that should take your concerns into account. Please advise whether this is acceptable.

I would be willing to consent to a similar stip and order allowing for Ms. Reeser's continued deposition post-discovery cutoff, but since Ms. Hood's deposition was scheduled for today, I want to finalize Ms. Hood's stip and order by the end of the day.

- Keith

From: Miglio, Terrence J. [mailto:tjmiglio@varnumlaw.com]
Sent: Friday, March 27, 2015 3:33 PM
To: Keith Flynn
Subject: Reeser

Ms. Hood has authorized me to accept service of the subpoena on her behalf.

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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

NATALIE REESER,

Plaintiff,

v.

HENRY FORD HOSPITAL,

Defendant.

Case No.: 2:14-cv-11916-GCS-MJH

Hon. George Caram Steeh
Magistrate Judge Michael Hluchaniuk

MILLER COHEN, P.L.C.

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**STIPULATED ORDER TO TAKE DISCOVERY DEPOSITION
AFTER THE DISCOVERY CUTOFF**

Plaintiff Natalie Reeser and Defendant Henry Ford Hospital stipulate as follows:

Currently, the deadline for discovery is April 6, 2015 pursuant to Dkt. No. 22. Plaintiff noticed and subpoenaed Jill Hood to appear for her deposition on March 23, 2015. This date was re-noticed for March 27th pursuant to an agreement

between the attorneys to instead depose Ms. Reeser on March 23rd. Ms. Hood's deposition must be rescheduled because she is no longer available on March 27th.

Consequently, the parties stipulate that Ms. Hood's discovery deposition will take place after the close of discovery, that the deposition shall be governed by and used for all purposes allowed under the Federal Rules of Civil Procedure, and that Plaintiff may subpoena the witness to compel her attendance even after the close of discovery. Defendant's counsel will accept service of the subpoena on Ms. Hood's behalf via First Class mail.

IT IS SO ORDERED that Ms. Hood's discovery deposition will take place after the close of discovery, that the deposition shall be governed by and used for all purposes allowed under the Federal Rules of Civil Procedure, and that Plaintiff may subpoena the witness to compel her attendance even after the close of discovery. Defendant's counsel will accept service of the subpoena on Ms. Hood's behalf via First Class mail.

Dated: _____

HON GEORGE CARAM STEEH

STIPULATED AS TO FORM AND SUBSTANCE:

MILLER COHEN P.L.C.

VARNUM LLP

By: /s/Keith D. Flynn
Keith D. Flynn (P-74192)

By: /s/Terrence J. Miglio (w/consent)
Terrence J. Miglio (P-30541)